

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

KATELYN HANKS,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION
vs.	)	
	)	File No. 3:19-CV-821
UNITED COMMERCE CENTERS, INC.,	)	
	)	
Defendant.	)	

**JOINT STIPULATION TO APPROVE CONSENT DECREE  
AND TO DISMISS DEFENDANT WITH PREJUDICE**

Plaintiff, **KATELYN HANKS** (“Plaintiff”), and Defendant, **UNITED COMMERCE CENTERS, INC.** (“Defendant”) (collectively, the “Parties”), hereby file this Joint Stipulation seeking the Court’s Approval of the parties’ Consent Decree and to Dismiss Defendant, **UNITED COMMERCE CENTERS, INC.**, with Prejudice:

1. Plaintiff filed the instant cause of action alleging that the Facility and property operated and/or owned by Defendant violated Title III of the Americans with Disabilities Act, 42 U.S.C. § 12181 *et seq.*

2. The matters raised by Plaintiff’s Complaint have been resolved in accordance with the Consent Decree (“Settlement”) attached hereto as Exhibit “1”.

3. In accordance therewith, the Parties request that the Court review, approve and ratify the Consent Decree. Additionally, the Parties request the Court retain jurisdiction to enforce the terms of the Settlement. This Settlement is conditioned upon the Court’s retaining jurisdiction to enforce said Settlement.

4. As part of the Settlement reached between the Parties, Plaintiff has agreed to

dismiss Defendant, **UNITED COMMERCE CENTERS, INC.**, with prejudice. Accordingly, the Parties request, upon the Court's review, approval and ratification of the Settlement, Defendant, **UNITED COMMERCE CENTERS, INC.**, be dismissed with prejudice.

5. Except as otherwise stated in the Settlement, each party to bear their own fees and costs.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an Order approving the attached Consent Decree, dismissing the claims asserted by Plaintiff against Defendant, **UNITED COMMERCE CENTERS, INC.**, with prejudice, and retaining jurisdiction to enforce the Settlement.

Respectfully submitted this 15<sup>th</sup> day of October, 2019.

Law Offices of  
THE SCHAPIRO LAW GROUP, P.L.

/s/ Douglas S. Schapiro  
Douglas S. Schapiro, Esq.  
Northern District of Texas ID No. 54538FL  
*Attorney-in-Charge of Plaintiff*  
The Schapiro Law Group, P.L.  
7301-A W. Palmetto Park Rd., #100A  
Boca Raton, FL 33433  
Tel: (561) 807-7388  
Email: [schapiro@schapirolawgroup.com](mailto:schapiro@schapirolawgroup.com)

Law Offices of  
LIPPE & ASSOCIATES

/s/ Emil Lippe, Jr.  
Emil Lippe, Jr., Esq.  
State Bar No. 12398300  
Lippe & Associates  
12222 Merit Drive, Suite 1200  
Dallas, TX 75251  
Tel: (214) 855-1850  
Fax: (214) 720-6074  
[emil@texaslaw.com](mailto:emil@texaslaw.com)

/s/ Robert F. Maris  
Robert F. Maris, Esq.  
State Bar No. 12986300  
Glast, Phillips & Murray  
14801 Quorum Drive, Suite 500  
Dallas, TX 75254  
Tel: 972-419-8387  
Email: [rmaris@gpm-law.com](mailto:rmaris@gpm-law.com)

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY, a true and correct copy of the above and foregoing has been filed electronically the Clerk of the Court using CM/ECF/system on this 15<sup>th</sup> day of October, 2019.

/s/ Douglas S. Schapiro  
Douglas S. Schapiro, Esq.  
Northern District of Texas ID No. 54538FL  
*Attorney-in-Charge of Plaintiff*